

HOLLAND & HART LLP



Bradford J. Williams

Phone (303) 295-8121

Fax (303) 223-3271

BJWilliams@hollandhart.com

October 3, 2014

VIA ECF

Hon. Magistrate Judge Lois Bloom
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Ruthbey Perez v. Frontier Airlines* (14-CV-5211 (BMC) (LB))

Dear Hon. Magistrate Judge Bloom:

We represent Defendant Frontier Airlines in the above-captioned matter. Frontier Airlines hereby respectfully requests a 21-day extension of time, to and including October 30, 2014, within which to answer or otherwise respond to Plaintiff Ruthbey Perez's complaint.

Frontier Airlines was served with Ms. Perez's summons and complaint via mail on September 15, 2014. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i) and 6(d), Frontier Airlines' answer or other complaint is currently due on or before October 9, 2014. Undersigned counsel was just recently retained in this matter and is currently working to collect information needed to answer or otherwise respond to Ms. Perez's complaint. In addition, a second counsel for Frontier Airlines, Mr. Brian Mumaugh, is also currently in the process of preparing his pro hac vice admission motion in order to represent Frontier Airlines in this matter. For these reasons, Frontier Airlines respectfully requests a 21-day extension of time, to and including October 30, 2014, within which to answer or otherwise respond to Ms. Perez's complaint.

Frontier Airlines has requested no previous extensions of time within which to answer or otherwise respond to Ms. Perez's complaint. Undersigned counsel conferred via telephone with Ms. Perez on October 1, 2014, and was advised that Ms. Perez does not object to the relief requested herein. As reflected below, undersigned counsel is hereby sending a copy of this letter to Ms. Perez, a non-ECF participant, via U.S. mail, postage prepaid.

Thank you for your consideration of this matter.

Very truly yours,

Bradford J. Williams
for Holland & Hart LLP

Holland & Hart LLP

Phone [303] 295-8000 Fax [303] 295-8261 www.hollandhart.com

555 17th Street Suite 3200 Denver, CO 80202 Mailing Address P.O. Box 8749 Denver, CO 80201-8749

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Affirmation of Service

I hereby certify that on this date, I caused a copy of the attached letter to be served upon Plaintiff Ruthbey Perez by mailing it, via U.S. Mail postage prepaid, to:

Ruthbey Perez
41-46 50th Street, Apt. 2B
Woodside, NY 11377

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brad J. Williams", written over a horizontal line.

Bradford J. Williams
Holland & Hart LLP
555 Seventeenth Street, Suite 3200
Denver, CO 80202
bjwilliams@hollandhart.com
(303) 295-8121